

**PROTOCOL REGARDING FILING RULE 12(b)(1), (b)(2) AND/OR 12(b)(5) DEFENSES IN
TELOMER WATER PROVIDER TIER TWO CASES**

Any defenses under Rules 12(b)(1), 12(b)(2) and/or 12(b)(5) that Defendants may have in any of the Telomer Water Provider Tier Two cases are expressly preserved and not waived. Defendants need not file Rule 12(b)(1), 12(b)(2) or 12(b)(5) motions with respect to the Telomer Water Provider Tier Two cases at this time. They may raise these defenses by motion at a later date, in accordance with the case management schedule that has been established by this Court.

April 9, 2024
Charleston, South Carolina